



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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March 13, 2009

Bill Brawner
Headquarters, Department of the Army
Base Realignment and Closure Division (DAIM-BD)
2530 Crystal Drive
Arlington, VA 22202

Re: Fort Sheridan Landfills 6 and 7 2008
4th Quarter Inspection Report, Revision 1
Fort Sheridan, Illinois

0970555001/Lake
Fort Sheridan (BRAC)
Superfund/Technical

Dear Mr. Brawner:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Army's Fort Sheridan Landfills 6 and 7 2008 4th Quarter Inspection Report and the subsequently issued Revision 1 of that same document. The original document was dated February 12, 2009 and was received on February 17, 2009. The revised version was dated February 20, 2009 and was received on March 5, 2009. The cover letter with the original document requested permission to modify the monitoring frequency for the gas probes surrounding those two landfills. Illinois EPA has reviewed both versions of the submittal and the Army's request and is herein providing a response.

The Army's request, as written in the cover letter, was to "cease monitoring on a monthly basis and go to an annual basis since (1) there have been no detects within the probes in the outer zone and (2) the past three years of data exhibit no seasonal variation or trends within the referenced probes." It is noted that surrounding both landfills are two rows of gas probes; one row (inner probes) is located very near the landfill cap. The other row (outer probes) is located 100-150 feet away from the landfill cap. After reviewing the data, both recent and historical, the Agency can agree to a reduced frequency of gas sampling within the outer row of probes and those inner probes with no previous exceedances to an annual basis, as requested. However, those three inner probes where exceedances have been routinely documented must remain on a monthly schedule.

If, in the future, those three inner probes cease showing exceedances for three consecutive

months, then monitoring of those probes may be reduced to quarterly. If then those probes go 4 consecutive quarters without an exceedance; the monitoring frequency shall be further reduced to an annual basis. Those probes could then be sampled at the same time as the remainder of the gas probes. However, as written in the Operations and Maintenance Plan, if an exceedance is noted, sampling will revert to monthly until such time as there is no longer a methane issue (exceedance) as defined in the Operations and Maintenance Plan.

If you have any questions regarding anything in this correspondence, you may contact me at 217/557-8155 or via electronic mail at Brian.Conrath@illinois.gov.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Bill O'Donnell, Army BRAC
Howard Hickey, US Navy - EFA Midwest
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